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expanded the scope of discovery, and the parties are clearly in need of more time for fact discovery on both sides. Even granting Plaintiffs' request for a fourteen-day extension leaves Bacar with receiving Plaintiffs' responses only three days prior to the expiration of fact discovery. Yet, most crucially, Bacar also requires additional time for discovery due to the addition of a Plaintiff to this lawsuit. Bacar would respectfully ask this Court to grant its Motion to Amend the Court's Case Management Order [Doc. 55], so that an extension does not prejudice any parties, and discovery can continue as needed by both sides.

WHEREFORE, Bacar respectfully requests that the Court grant its motion [Doc. 55] to amend the deadlines set in the Court's Amended Case Management Order of January 18, 2024 [Doc. 44], vacate the deadlines set therein, and adopt the Proposed Second Amended Case Management Order filed contemporaneously with Bacar's Motion to Amend the Case Management Order [Doc. 55]. Bacar further requests any other relief that the Court may deem appropriate.

Dated this 2nd Day of July 2024.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that notice has been provided via the Court's electronic filing system to counsel of record including the following:

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